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Contains No Col

February 4, 2008

TSCA Confidential Business Information Center (7407M)
EPA East – Room 6428 Attn: TSCA Section 8(e) Coordinator
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302



Re: Napthalene Sulfonic Acid, Sodium Salt, Mixture of Isopropyl Congeners CAS # 68442-09-1

TSCA Section 8(e) Coordinator:

On behalf of our client the Joint Inerts Task Force (JITF) Cluster Support Team 10 (JITF CST 10) (1156 15<sup>th</sup> St. N.W., Suite 400, Washington, D.C. 20005, EPA Company Number 84915), Exponent, Inc. is submitting information pursuant to the provisions of Section 8(e) of the Toxic Substance Control Act (TSCA). The JITF CST 10 includes the following member companies: Akzo Nobel Surface Chemistry, LLC, BASF Corporation, Bayer Crop Science, Cognis, Chemtura, Dow AgroSciences, LLC, DuPont, FMC Corporation, ISK Biosciences, Nufarm Americas, Rhodia, Inc., Syngenta, and Valent USA.

The following information is a summary of available data that is being reported under TSCA Section 8(e):

The JITF CST 10 will conduct a Combined Repeated Dose Toxicity Study with a Reproduction/Developmental Toxicity Screening Test (OECD 442 – OPPTS 870.3650) using Napthalene sulfonic acid, sodium salt, mixture of isopropyl congeners (CAS # 68442-09-1).

A range-finding study is ongoing in order to set appropriate doses for the main study and to determine the maximum tolerated dose (MTD). The dose levels were chosen on the basis of an acute oral LD<sub>50</sub> value of 1115 mg/kg.

The test substance, CAS 68442-09-1, is administered by oral gavage to groups of 3 male and 3 female rats at doses of 40, 140 and 490 mg/kg/day. The doses are adjusted using a correction factor of 1.14 to account for purity of the test substance (88%).

One male rat and three female rats in the highest dose group (490 mg/kg) were found dead after 2 days of treatment; the remaining two males of this group were sacrificed



prior to scheduled termination on study day 3 for ethical reasons. All animals in this group lost weight since the beginning of treatment (4, 6 and 7 g in the females, 25 g in the male found dead and 17 and 14 g in the other two males). It was noted that all animals in this group pushed their heads through the bedding material after administration of the test material. Sedation was also observed in all males treated at 490 mg/kg/day. At necropsy, the male found dead showed a thymus with several reddish foci, a stomach with fibrin-like coating, and a rectum with liquid content. Two females were also noted to have a thymus with reddish foci and one had small intestine with liquid content. No abnormalities were found in the one female or the two males sacrificed for ethical reasons.

The in-life part of the range-find study is scheduled to be completed during March 2008.

JITF CST 10 asserts that none of the information contained within this notice constitutes confidential business information.

If you have any questions, please contact me by phone at (202) 772-4932.

Sincerely,

James Messina

Authorized Representative of Joint Inerts Task Force CST 10

Jin Messina /CCD

cc:

FIFRA 6(a)(2) JITF CST 10

Angelina Duggan, Exponent Michela Dall'Osto, Exponent